

**SUPERIOR COURT, STATE OF CONNECTICUT,  
JUDICIAL DISTRICT OF HARTFORD**

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**STATE OF CONNECTICUT,  
COMMISSIONER OF LABOR,  
KURT WESTBY**

**Plaintiff,**

**-Against-**

**DOCKET: HHD-CV-6135081-S**

**ANSWER**

**FASHION PLATE INC./ BALDANZA ON ELM LLC,  
SAMUEL BALDANZA**

**Defendants.**

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Defendants SAMUEL BALDANZA, *Pro Se*, as and for his answer to the Complaint,

Respectfully alleges and shows this court upon information and belief as follows:

1. Admits the allegations of Count I paragraphs 2, 3, 4, and 5. Count II paragraph 2. Count III paragraph 8.
2. Denies the allegations of Count I, paragraphs 7, 8, 10. Count III, paragraphs 9, 10 and 11.
3. Denies Knowledge or information sufficient to form a belief as to the allegations of Count I paragraphs 1, 6, and 9. Count II paragraph 1, 3, and 4.

**AS FOR THE FIRST AFFIRMATIVE DEFENSE**

4. Defendant Samuel Baldanza knowing there would be an undetermined tax liability for Fashion Plate entered into a partnership with Guy P. Wyser-Pratte, an arbitrageur, to operate a new restaurant in Bedford NY. On June 6, 2017 Mr. Wyser-Pratte fraudulently removed all working capital of \$175,000 from the checking account of Baldanza on Elm LLC by wire transfer.
5. By reason of the foregoing, and as a direct result of the misconduct of Wyser-Pratte, the defendants have been harmed and Guy P. Wyser-Pratte should bare full responsibility for all outstanding Baldanza on Elm, LLC tax and labor claims.

WHEREFORE, Defendant Samuel Baldanza respectfully requests that (a) all causes of action stated in the Complaint be dismissed and (b) judgement for all asserted claims be filed against Guy P. Wyser-Pratte.

Dated December 1, 2020

Samuel Baldanza

A handwritten signature in black ink, appearing to be 'S. Baldanza', with a long horizontal flourish extending to the right.

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